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11 JOHNSON & JOHNSON LONG-TERM  
12 DISABILITY INCOME PLAN

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA

15 KATHLEEN VANBUSKIRK,

16 Plaintiff,

17 vs.

18 JOHNSON & JOHNSON LONG-  
19 TERM DISABILITY INCOME  
20 PLAN,

21 Defendant.

Case No.: C07-01970CRB

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING  
CONTINUANCE OF CASE  
MANAGEMENT CONFERENCE  
AND SUPPORTING  
DECLARATION OF MARK A.  
NEUBAUER, ESQ.**

**[Local Rules 6-1(b) and 6-2(a)]**

Judge: Hon. Charles R. Breyer

Pursuant to the United States District Court's Civil Local Rules 6-1(b) and 6-2(a), Plaintiff Kathleen Vanbuskirk ("Plaintiff") and Defendant Johnson & Johnson Long-Term Disability Income Plan ("Defendant"), through their respective counsel of record, HEREBY STIPULATE and agree that the initial Case Management Conference in this matter be continued from July 13, 2007 at 8:30 a.m. to July 20, 2007 at 8:30 a.m., as Defendant's trial counsel will be out of state on a long-planned occasion with his family, and therefore unavailable to appear in Court on July 13, 2007.

Dated: June 13, 2007

STEPTOE & JOHNSON LLP

Mark A. Neubauer

Katessa C. Davis

By

Katessa C. Davis  
KATESSA C. DAVIS

Attorneys for Defendant

JOHNSON & JOHNSON LONG-TERM  
DISABILITY INCOME PLAN

Dated: June 13, 2007

LEWIS, FEINBERG, LEE, RENAKER &  
JACKSON

Cassie Springer-Sullivan

Michelle Roberts

By

Cassie Springer-Sullivan  
CASSIE SPRINGER-SULLIVAN

Attorney for Plaintiff

KATHLEEN VANBUSKIRK

**DECLARATION OF MARK A. NEUBAUER**

I, Mark A. Neubauer, declare as follows:

1. At all relevant times herein, I am and have been a partner in the law firm of Steptoe & Johnson LLP, counsel of record for Defendant Johnson & Johnson Long-Term Disability Income Plan ("Defendant") in this matter, and I am and have been one to the lawyers at my firm primarily responsible for this matter. I have personal knowledge of all of the facts set forth in this Declaration, and if called and sworn as a witness at trial or at any other proceeding before this Court, I could and would competently testify as set forth herein.

**Good Cause Exists for the Enlargement of Time**

2. I am the trial counsel for Defendant in this matter and I will participate in the early meeting of counsel. I want to appear at the Case Management Conference on behalf of Defendant in this matter. However, I am unable to attend the Case Management Conference currently scheduled on July 13, 2007, as I am scheduled be out of the state of California on that date at our cabin in Eagle River, Wisconsin, on a long-planned vacation with my wife and five daughters.

3. Therefore, Defendant requests that the Case Management Conference be continued for only one week, from July 13, 2007 at 8:30 a.m. to July <sup>27</sup>~~26~~, 2007 at 8:30 a.m. so that I may attend.

4. Plaintiff's counsel does not object to the one week continuance of the Case Management Conference.

5. Except for an extension of the time for Defendant to respond to Plaintiff's complaint, there have not been any previous time modifications in this case.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
 MARK A. NEUBAUER

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: June 18, 2007

The Honorable Charles R. Breyer

